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November 14, 2002

VIA FACSIMILE (651-3836) AND U.S. MAIL

Michael A. Roberts, Esq.
Graydon, Head & Ritchey LLP
1900 Fifth Third Center
511 Walnut Street
Cincinnati, OH 45202-3157

Re: Eric L. Jeffries v. Centre Life Insurance Company, et al.
Case No. C-1-02-351

Dear Mike:

I am writing in response to your November 11, 2002 letter. We will make our best efforts to retain Dr. Grubbs for purposes of an IME of your client. Failing that, we will once again attempt to find someone locally.

Upon receipt of your agreement that Mr. Jeffries will attend an IME with Dr. Grubbs or a physician locally; his agreement to complete the IME with Dr. Hartings; and receipt of unilateral medical releases from Mr. Jeffries, our client has agreed to resume payments of benefits to Mr. Jeffries under a reservation of rights. However, we will not agree at this time to pay benefits during the period of time that Mr. Jeffries was in breach of his insurance policy.

We hope to confirm the date for an IME by the end of this week.

Finally, with regard to the ERISA issue, we are working on our end to obtain additional information and will contact you in the event we need to schedule depositions. In that regard, it would be helpful if your client could locate and provide us with some of his paystubs from Provident Bank.

Very truly yours,

William R. Ellis
William R. Ellis

WRE/smk

cc: Carrie Barnes, Esq.
Peter M. Burrell, Esq.

75th Anniversary
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